From: James Broderick
To: Contact OGE
Subject: Legal expense fund regulation
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C'mon guys.

The legal expense fund regulation, as drafted, stinks.

* Remove the exception that makes compliance with the regulation optional;

* Replace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests;

* Remove the offensive example involving an accused sexual harasser; and

* Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Thank you,
Jim Broderick